Held, that this instruction was correctly refused. *King* v. *City of Owensboro*, 218 S. W. 297 (Ky.).

At common law a wife committing a crime in the presence of her husband was presumed to have acted under his coercion. *Com.* v. *Eagan*, 103 Mass. 71; *State* v. *Martini*, 80 N. J. L. 685, 78 Atl. 12. This presumption must have been based on the complete control once exercised by the husband over his wife's person and property. See 4 BL. COMM. 28; *Morton* v. *State*, 141 Tenn. 357, 360, 209 S. W. 644, 645. But a wife cannot now be chastised or imprisoned by her spouse. *The Queen* v. *Jackson*, [1891] 1 Q. B. 671. The Married Woman's Act of Kentucky completely frees her property. 1915 CARROLL'S KENTUCKY STATUTES, c. 66, §§ 2127, 2128. This act, with similar legislation in nearly all jurisdictions, effectively brings to an end the husband's control. See *Martin* v. *Robson*, 65 Ill. 129, 132, 139; *State* v. *Hendricks*, 32 Kan. 559, 563, 4 Pac. 1050, 1053. With this gone, the presumption of coercion, based on it, should go also. The principal case is undoubtedly judge-made law, but the conclusion seems desirable. The same result has been reached by statute. 1919 CAN. CRIM. CODE, 21; N. Y. PENAL CODE, § 1092.

JURISDICTION — VENUE — ACTION FOR CONVERSION OF ORE TAKEN FROM LAND IN ANOTHER STATE. — The plaintiff sued in Maine for the conversion of ore taken from his land in Arizona. The defendant pleaded to the jurisdiction that the only ore taken was from land *bona fide* claimed by him. *Held*, that the court had jurisdiction. *Arizona Commercial Mining Co.* v. *Iron Cap Copper Co.*, 110 Atl. 429 (Me.).

The plaintiff sued in Massachusetts for the conversion of ore taken from his land in Arizona. The defendant pleaded to the jurisdiction that the only ore taken was from land *bona fide* claimed by him. *Held*, that the court did not have jurisdiction. *Arizona Commercial Mining Co.* v. *Iron Cap Copper Co.*, 128 N. E. 4 (Mass.).

The doctrine that actions for injuries to land are local is almost universally accepted, unless abolished by statute. *British South Africa Co.* v. *Companhia de Mocambique*, [1893] A. C. 602. The principal exception is that where the trespass is accompanied by a conversion of trees, crops, or soil taken from the land, the plaintiff may waive the trespass and sue for the conversion in a transitory action. *Stone* v. *United States*, 167 U. S. 178; *Stuart* v. *Baldwin*, 41 U. C. Q. B. 446. The Massachusetts court profess to agree with all the cases sustaining this exception, and attempt to distinguish them on the ground that in the principal case the defendant *bona fide* claimed title. Since the distinction between a *bona fide* claim and any claim not sham is impracticable, this argument can mean only that the exception is to be entirely abolished. The whole doctrine of local actions is a technical one and does little except to give rise to cases where there is a right without a remedy. See *Livingston* v. *Jefferson*, 1 Brock. (U. S.) 203, 208, 15 Fed. Cas. 660, 664. There seems every reason therefore not to abrogate its widest exception, and the Massachusetts decision cannot be regarded as either wise or sound.

LIS PENDENS — APPLICATION TO VENDOR'S LIEN SECURING NEGOTIABLE NOTE. — Certain land was conveyed to the defendant by one who had obtained a conveyance from the original owner by fraud. In payment, defendant signed negotiable notes secured by a vendor's lien on the land. The original owner brought action to recover the land, and filed notice of *lis pendens*. While this suit was still pending and before maturity of the notes, plaintiff purchased the notes for value and without actual notice of the suit, and sued to foreclose on the lien securing them. *Held*, that he is not chargeable with notice of the suit. *Pope* v. *Beauchamp et al.*, 219 S. W. 447 (Tex.).

Courts are more and more recognizing that incidental provisions to negotiable